

Appl. No. 09/707,624  
Amdt. dated August 29, 2005  
Reply to Office action of March 29, 2005

### Remarks

Claims 1-29 are pending in the application. Claims 1-16 have been allowed and claims 17-29 have been rejected. No amendments to the application have been made.

Applicants respectfully traverse the rejection under 35 U.S.C. 102(b) of Claims 17-29, as being anticipated by U.S. Patent No. 5,491,517 of Kreitman et al.

The Examiner cites elements 62 and 64 of FIG. 5, Fig. 2, Fig. 21, lines 26-51 of column 13, and lines 45-55 of column 14 as meeting the following elements of independent claims 17 and 28, respectively:

In claim 17, "rendering, for each at least one target, a target image based on at least a predefined three-dimensional model of the at least one target area within the site and camera's position and pointing direction, the three-dimensional model being of less than the entire site;" and

In claim 28, "a model renderer for generating, a synthetic image based on a predefined three-dimensional reference model including a target area within a site from a known position of a camera, the three-dimensional model being of less than the entire site, the synthetic image having a target image inserted in the target area."

However, there is no mention by Kreitman et al. of a 3-dimensional model of a site in which the camera is situated. Model 50, which the examiner references, is a flat, 2-dimensional representation of the surface of a tennis court, and is illustrated by Fig. 3. See col. 6, lines 3-6. Kreitman et al. explain in Column 2, lines 17-24, how their system makes use of this model:

To determine the location of the portion to receive the implantation, the image implantation system includes a unit for receiving a) a flat model of the fixed surfaces of the background space and b) an image mask indicating the portion of the flat model onto which the image is to be mixed. Via the model, the image implantation system identifies if and where the portion is shown in the frame.

Figure 2 is simply an illustration of an actual tennis court to show where cameras 30 are placed. See col. 5, lines 32-36. Note also the presence of the tennis players. Figure 3 illustrates the flat model on which the image implantation system relies. It is submitted that columns 13 and 14, and Fig. 21, relating to discussion of changing the flat geometric model of the tennis court based on perspective of the cameras, using the perspective identification unit 62 (shown in Fig. 5). There is no mention of a 3-dimensional model of the site.

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Because Kreitman et al. does not disclose use of a 3-dimensional model of the site, it cannot anticipate claims 17-29. Therefore, the rejection is in error. Applicants therefore respectfully request its withdrawal upon reconsideration.


As the rejection is clearly in error for at least this reason, Applicants have chosen not address other errors in the rejection but reserve the right to do so. They do not acquiesce in, or waive any rights to complain about, the remainder of the reasoning supporting the rejection of claims 17-29.

Applicant respectfully requests reconsideration and allowance of the application in view of the foregoing remarks. Please telephone the undersigned representative should he be of any assistance in connection with the reconsideration.

Please charge deposit account no. 13-4900 of Munsch Hardt Kopf & Harr, P.C. any additional fees associated with this paper.

Respectfully submitted,

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